

EXHIBIT 14

W&B
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January 28, 2002

Via Facsimile Transmission & U.S. Mail
(215) 568-1044
Joshua Sarnier, Esquire
SARNER & ASSOCIATES
11 Penn Center, 29th Floor
Philadelphia, PA 19103

RE: Jodi H. Brown, M.D. v. Mara Flamm

Dear Mr. Sarnier:

On Friday, January 25th an employee of your firm appeared at Ms. Flamm's workplace harassing her and her fellow employees. When he was unable to speak with Ms. Flamm, he demanded to see her supervisor and then the dean of the College. When that was not possible, he took an administrative assistant aside and screamed at her that he did not know what type of people they hire at Peirce College and that she owes \$6000 to a doctor. He further told the administrative assistant that Ms. Flamm has been giving different names and addresses in efforts to avoid him. He yelled at the administrative assistant and told her that the next time he came back would be with the Sheriff to arrest Ms. Flamm. He concluded his tirade by stating Peirce College has a hired a "sneaky little thief".

I do not know what type of practice you run, but this type of workplace harassment and defamation are unacceptable and actionable at law. I am further incensed that you engaged in this type of harassment knowing full well that Ms. Flamm is my wife. I expected some type of civility from you and your firm but received none. You will receive the same courtesies from me in the suit I intend to file against you and your firm.

Very truly yours,

WILK & BRAND, P.C.



ROBERT P. BRAND

EXHIBIT 15

I received a phone call from the front desk around 1:00pm. The guard asked if Mara Flamm was in and I told her that she was in a meeting. She repeated what I said a gentleman replied, "is her supervisor available". The guard asked if her supervisor available and I replied, "is this an advising or faculty problem". The gentleman replied in a loud tone "it's a problem with her". I then asked the guard to put the gentleman on the phone. I asked if I could help him. He said that he needs to speak with Mara Flamm. I asked if he was a student and he replied no. I told him that she was in a meeting and is not available. He then asked for her supervisor. I told him that they were in the meeting together. He then asked who I was and I told him. He then asked if I could accept a package for Mara. I told him yes and that I would be down. I went to the lobby and he asked if we could go somewhere and talk. At this point I was a little skeptical because of the tone of his voice and the way he looked. But because I got such a bad vibe from this person, I said yes. I used one of the empty offices in the IT area on the first floor. We step into the office and he immediately began lashing out in a very aggressive tone. He said that "I don't know what kind of sneaky little thieves you hire, but Mara Flamm stole thousands of dollars from a doctor and haven't paid". He also said that they have been coming here looking for her for over two years and every time they come she is always unavailable. I then said that you know this is none of my business and why haven't you contacted her at home. He said they have tried and she's given them phony addresses and phone numbers and this is the only way they have been able to contact her. He then said that a service was provided to Mara and that she is not paying up. She was to appear in court and never showed up. He then repeated that she was a thief and that if these are the type of people we have working for us we are in trouble. He told me to tell her that the next time they have to come, they will bring the sheriff and arrest her. He then passed me an envelope and asked that I make sure that she receives it. He apologized to me for having to hear this and left.

home?

I was very upset for having to hear this and shocked that he told me. I was very embarrassed for Mara because he came to the job and basically told anyone who would listen her personal business. He didn't appear professional at all. He was very aggressive, loud and nasty.

Carmita Rutling

Carmita Rutling
Administrative Assistant
Peirce College

EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARA FLAMM, : CIVIL ACTION

Plaintiff,

V.

SARNER & ASSOCIATES, P.C. :

and JOSHUA SARNER, ESQUIRE:

and LEONARD SARNER,

ESQUIRE and JODI H. BROWN :

M. D. and JOHN MATUSAVAGE, :

Defendants : NO. 02-4302

August 16, 2004

Oral deposition of CARMITA
RUTLING, held in the offices of Christie,
Pabarue, Mortensen & Young, 1880 John F.
Kennedy Boulevard, 10th Floor,
Philadelphia, Pennsylvania 19103,
commencing at 4:05 p.m., on the above
date, before Torre Lynn Adams, Court
Reporter and Notary Public of the
Commonwealth of Pennsylvania.

ESQUIRE DEPOSITION SERVICES

15th Floor

1880 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103

(2 1 5) 9 8 8 - 9 1 9 1

Rutling

1 to put in that you didn't get to put in?

2 A. No.

3 Q. Now, with regard to the
4 deliveryman, do you know who else this
5 person spoke to at Pierce?

6 A. Who the delivery guy spoke
7 to?

8 Q. Yes.

9 A. Just the security guard.

10 Q. Did you ever discuss this
11 incident with your co-workers?

12 A. No.

13 Q. What about your supervisor?

14 A. I haven't spoke to her
15 about it until the subpoena had came.

16 MR. GRAF: Which subpoena,
17 yours?

18 BY MR. McDEVITT:

19 Q. The subpoena for your
20 testimony here today?

21 A. Yes.

22 Q. And you and I spoke about
23 scheduling this matter?

24 A. Correct.

Rutling

1 Q. Do you recall what your --
2 what the conversation with your
3 supervisor consisted of?

4 A. I just told her that I had
5 the subpoena to be deposed, and I gave
6 her a copy of it so that she can approve
7 me to leave early.

8 Q. Did you talk about the
9 reason you were being subpoenaed?

10 A. I told her that it was a
11 civil case that Mara was going through,
12 and I was a witness.

13 Q. Did you discuss or relate
14 to her the incident that formed the basis
15 of the case?

16 A. No.

17 Q. Did you ever discuss this
18 incident with people outside of Pierce?

19 A. I probably told my brother.

20 Q. Has your brother ever met
21 Mara Flamm?

22 A. No.

23 Q. Can you think of anyone
24 else outside of Pierce that you might

Rutling

1 have spoken to about this incident?

2 A. That's it.

3 Q. Did you ever hear people at
4 Pierce talk about that incident?

5 A. No.

6 Q. And you said you hadn't
7 heard any gossip about Mara Flamm?

8 A. Um-um.

9 Q. And no gossip about the
10 incident or that crazy guy that came in
11 one day to deliver something?

12 A. No.

13 Q. Had you ever met any other
14 person who came to Pierce to try to --
15 withdraw that.

16 Have you ever met anybody
17 else who came to Pierce who said that
18 they were there to collect money from
19 Mara Flamm?

20 A. No.

21 Q. Do you know if Mara Flamm
22 ever received any warnings or sanctions
23 or disciplinary actions from Pierce?

24 A. No.

Rutling

1 Q. At that point you knew that
2 you could throw him out of there, right?

3 A. He wanted to talk, I'm not
4 going to say, okay, whatever --

5 Q. But you had a security
6 guard there that could throw him out?

7 A. Yes.

8 Q. Security force?

9 A. The security, uh-hum.

10 Q. You then went into this
11 private room with him; is that right?

12 A. Uh-hum.

13 Q. Words were said back and
14 forth; is that right?

15 A. Yes.

16 Q. Now, you indicated earlier
17 that he said something about Mara being a
18 thief?

19 A. Yes.

20 Q. Did you think that she was
21 a thief?

22 A. Did I think that she was a
23 thief?

24 Q. Right.

Rutling

1 A. At the time?

2 Q. Yes.

3 A. I didn't even care if she
4 was a thief or not.

5 Q. Did you ever think that she
6 was a thief?

7 A. No, I had no reason to
8 think that she was a thief.

9 Q. He said that she had stolen
10 money from a doctor?

11 A. Right.

12 Q. Did he say how much?

13 A. He said thousands of
14 dollars.

15 Q. Thousands of dollars.

16 Did you think then that
17 that was a true statement that she had
18 stolen money from a doctor?

19 A. I didn't know what to
20 think. I just knew that he was upset and
21 that he was telling me something that I
22 shouldn't have been hearing.

23 Q. But you didn't believe him
24 when he said she stole thousands of

Rutling

1 dollars?

2 A. I don't think I thought
3 about believing him or not believing him,
4 I was just listening.

5 Q. I'm looking at your
6 statement. There's a reference here to
7 sneaky little thief. Did you think that
8 Mara was a sneaky little thief?

9 A. It was just his statement.

10 Q. You didn't believe it,
11 though?

12 A. It wasn't even for me to
13 believe. I couldn't believe he was
14 standing there saying that.

15 Q. You didn't think that was
16 true?

17 A. No.

18 Q. And you told him that that
19 was none of your business?

20 A. None of my business.

21 Q. And then you asked him why
22 he had not contacted her at home; is that
23 right?

24 A. Yes.

Rutling

1 had filed for bankruptcy?

2 A. No.

3 Q. Did you ask her about why
4 this had happened?

5 A. No.

6 Q. You didn't ask her about
7 why the incident had happened at all?

8 A. No.

9 Q. She did apologize, but she
10 didn't apologize for herself, she
11 apologized for the person who came in,
12 right?

13 A. Right.

14 Q. She didn't apologize for
15 what she did?

16 A. No.

17 Q. Did you believe anything
18 that this guy said about Mara, the
19 process server?

20 A. I can't say that I did.

21 Q. After you spoke to Mara the
22 first time, how did she take it, how did
23 she react?

24 A. She was upset.

Rutling

1 Q. Did you see any signs of
2 anxiety?

3 A. Anxiety, no.

4 Q. Short temper?

5 A. No. Mara is always in like
6 a good, bubbly mood.

7 Q. Did she stay in a good,
8 bubbly mood after this?

9 A. Uh-hum.

10 Q. Only during the afternoon
11 of the day the process server was there
12 was she not in a good mood?

13 A. No, she wasn't.

14 Q. Every day you saw her
15 thereafter she was in a bubbly mood?

16 A. I mean she was her normal
17 self.

18 Q. Did you notice that she
19 started missing classes at all after this
20 incident?

21 A. I don't keep up with her
22 class schedule, I know when she's in the
23 office.

24 Q. Did she start coming into

Rutling

1 MR. McDEVITT: Just a
2 couple follow-up questions.

3 - - -

4 EXAMINATION

5 - - -

6 BY MR. McDEVITT:

7 Q. When you took the process
8 server aside into the college offices I
9 believe you said, is that correct, were
10 the people who usually work in those
11 offices attending the same meeting that
12 Mara Flamm was attending?

13 A. No.

14 Q. After this incident with
15 the process server, did your relationship
16 with Mara Flamm change at all?

17 A. No.

18 Q. Did you feel any
19 differently towards Mara Flamm at all?

20 A. No.

21 Q. Do you believe that she
22 acted any differently towards you?

23 A. No.

24 MR. McDEVITT: I have no

EXHIBIT 17

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March 25, 2002

Via Facsimile Transmission & U.S. Mail
(215) 568-1044
Joshua Sarner, Esquire
SARNER & ASSOCIATES
11 Penn Center, 29th Floor
Philadelphia, PA 19103

RE: Jodi H. Brown, M.D. v. Mara Flamm

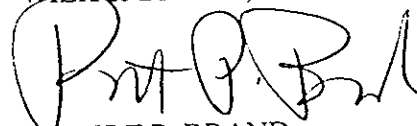
Dear Mr. Sarner:

Please be advised that I have been retained by Mara Flamm with respect to the above-captioned matter. Do not contact my client, particularly at her workplace, for any reason whatsoever. Any notices, correspondence or other documents regarding her Bankruptcy Petition should be addressed to her attorney, Jane MacElhenney, Esq.. Any notices, correspondence or other documents regarding all other matters shall be addressed to me.

If you have any questions, please advise in writing.

Very truly yours,

WILK & BRAND, P.C.


ROBERT P. BRAND

RPB/mdf

EXHIBIT 18

Flamm

1 A. I think she said he was
2 short, that's all I remember as far as
3 the description goes.

4 Q. By short, shorter than her?

5 A. I guess. I don't know.

6 Q. How tall is she?

7 A. I don't know.

8 Q. Is she taller than you?

9 A. She's taller than me, which
10 doesn't say much, but she's taller than
11 me.

12 Q. This person, was he able to
13 speak with the dean?

14 A. The dean wasn't there.

15 Q. Was she able to tell you
16 who else heard the interaction?

17 A. She didn't see, but she
18 said people could have certainly heard.

19 Q. Did she tell you that she
20 told other people about it?

21 A. No.

22 Q. To your knowledge, she
23 never spoke about this with anyone else?

24 A. Right.

Flamm

1 Q. Did anyone else at Pierce
2 ever approach you to speak about the
3 delivery of the document?

4 A. No.

5 Q. Who at Pierce have you
6 discussed the delivery of the documents
7 with?

8 A. Nobody.

9 Q. Just Carmita?

10 A. Just Carmita, yes.

11 Q. Did you or someone on your
12 behalf obtain a statement from Ms.
13 Rutling?

14 A. My attorney, I'm assuming.

15 Q. Did you obtain a statement
16 personally?

17 A. No.

18 Q. Did you have any part in
19 the conversations between your attorney
20 and Ms. Rutling about providing a
21 statement?

22 A. No.

23 Q. You didn't have your
24 attorney come to your office and advise

Flamm

1 Carmita -- and say this is my attorney?

2 A. No.

3 Q. Do you know how her
4 statement was prepared?

5 A. No.

6 Q. Do you know if she typed it
7 or if your attorney typed it for you?

8 A. No.

9 Q. No, you don't know or --

10 A. I don't know.

11 Q. In January of 2002, an
12 attorney filed a voluntary bankruptcy
13 petition on your behalf?

14 A. Yes.

15 Q. And your attorneys were Mr.
16 Brand and Jane MacElhenney
17 M-A-C-E-L-H-E-N-N-E-Y. You don't know,
18 but I'm going to represent to you that's
19 how it's spelled and represent this to
20 the court reporter.

21 Why did you file bankruptcy
22 in January of 2002?

23 A. I had debts, and in
24 particular, this debt with Dr. Brown, and

Flamm

1 I was interested in finding ways to
2 resolve those debts, and I didn't want
3 any more people coming to my place of
4 work harassing me.

5 Q. Other than the delivery
6 person in January of 2002, did anyone
7 else ever contact you at work about debts
8 that you owed?

9 A. No.

10 Q. By telephone or in person?

11 A. No.

12 Q. Do you know how much you
13 had in debt at that point?

14 A. No.

15 Q. Do you know how long before
16 filing the bankruptcy you had considered
17 the matter?

18 A. No, but I would say it was
19 the time of that October letter because I
20 didn't want any interference at work. I
21 was getting to a point where I just
22 didn't want my debts to interfere with
23 the life that I was trying to, you know,
24 then create.

Flamm

1 discussion with anyone at Pierce about
2 the delivery of the January 2002 letter?

3 A. No.

4 Q. Did you ever discuss the
5 delivery of the January 2002 -- let me
6 back up a second.

7 Did the delivery of the
8 January 2002 letter cause you any
9 physical, emotional or psychological
10 complaints?

11 A. Yes.

12 Q. What complaints?

13 A. Anxiety, stress,
14 sleeplessness.

15 Q. And how long did you
16 experience these symptoms?

17 A. I would say off and on, for
18 that entire semester, because although my
19 attorney told me that it was illegal for
20 anybody to come, especially after I filed
21 bankruptcy, the server came after I had
22 filed bankruptcy.

23 So, you know, I was still
24 very, very nervous. I thought that he

Flamm

1 would show up again to speak with the
2 dean at any moment, because he had gone
3 there illegally before or somebody else
4 might show up. I didn't really trust
5 this whole bankruptcy thing as far as
6 protecting me.

7 Q. And you started to feel
8 better after the spring semester into
9 2000 -- hang on.

10 How many semesters do they
11 have at Pierce, two or three a year?

12 A. Their semesters are
13 ongoing, fall, spring and summer session.

14 Q. When you say you were
15 experiencing these symptoms during that
16 semester --

17 A. I would say the symptoms
18 subsided somewhere in the following fall,
19 so through the spring and summer.

20 Q. So around September, you
21 think?

22 A. Uh-hum, uh-hum.

23 Q. Now, during that period
24 from January of 2002 until September of

Flamm

1 2002, how many courses were you teaching?

2 A. It varies because sometimes
3 I take on extra courses. So, I would say
4 the minimum, three, and at the --
5 including the summer. So, I would say at
6 the minimum, six; and at the maximum,
7 eight.

8 Q. Six to eight over the
9 entire course of that period?

10 A. Right.

11 Q. Were you pregnant during
12 that period?

13 A. What are the dates?

14 Q. We're talking January of
15 2002 until September of 2002.

16 A. Yes, I was.

17 Q. I'm sorry that --

18 A. I think.

19 Q. I have a feeling you might
20 be better with these dates than me --

21 A. Wait, wait.

22 Q. Okay.

23 A. If the twins were born
24 2003 -- December 18, 2003.

Flamm

1 MR. MESTER: Well, it's
2 2002, because September 2003 would
3 be this past December.

4 THE WITNESS: That's right.

5 MR. MESTER: I don't mean
6 to step in.

7 BY MR. McDEVITT:

8 Q. Twins 12 --

9 A. 18-02.

10 Q. Okay. So, if the twins
11 were born 12-18-2002, then I suppose if
12 we go back nine months, we're talking
13 about March 18, around 2002 for
14 conception. Do you recall when you
15 learned that you were pregnant with
16 twins, what month?

17 A. It was either March or
18 April, probably April.

19 Q. So, pretty soon?

20 A. Yes.

21 Q. Were you trying for a while
22 to have children?

23 A. Off and on, you know.

24 Q. Did your pregnancy cause

Flamm

1 alternative treatments like R-E-I-K-I,
2 R-O-L-F-I-N-G?

3 A. No.

4 Q. Now, were there any
5 problems with your bankruptcy or the
6 bankruptcy filings that you made?

7 A. No.

8 Q. Do you recall being
9 directed by the bankruptcy court to
10 submit an amended filing in February of
11 2002?

12 A. Yes.

13 Q. Do you know why you
14 submitted an amended filing?

15 A. I forget what it was. I
16 don't recall exactly.

17 Q. Did this needing to submit
18 an amended filing cause you any stress?

19 A. Yes and -- yes.

20 Q. Over the course of your
21 pregnancy, did you have any -- did any
22 health issues arise?

23 A. No.

24 Q. Do you believe that you've

Flamm

1 suffered any financial harm as a result
2 of that January 2002 delivery?

3 A. I don't know. It hasn't
4 played out yet.

5 Q. What do you mean it hasn't
6 played out yet?

7 A. I don't know what I'm going
8 to owe exactly, I don't know.

9 Q. What you're going to owe
10 who?

11 A. Attorneys, that kind of --
12 I don't know what my fees are at this
13 point.

14 Q. So the financial damage
15 that you believe you might have suffered
16 are the attorney's fees that you've
17 incurred in this lawsuit?

18 A. Yes.

19 Q. Do you believe that as a
20 result of the January 2002 delivery of
21 documents, that you haven't progressed as
22 far at your job as you could have?

23 A. No.

24 Q. So it didn't affect your

Flamm

1 A. Not that I recall.

2 Q. Did you ever have a
3 discussion with the dean at Pierce,
4 something along the lines of Mara, you do
5 a great job as a teacher, but if you had
6 worked a little harder, you might advance
7 here a little more.

8 A. No, because as a teacher,
9 the way you feel in a classroom affects
10 how you feel about yourself as a teacher,
11 and because I was experiencing
12 nervousness, I felt that I wasn't doing
13 as good as a job.

14 I'm a very good teacher and
15 I know I've done better in the past or
16 the future. Although I didn't do poorly
17 enough to elicit complaints, I know that
18 my performance wasn't as, you know,
19 effective as it normally is, but I don't
20 recall getting complaints.

21 Q. At Pierce, does the dean
22 ever, you know, sit faculty members down,
23 say, once a year to provide evaluation?

24 A. Yes.

Flamm

1 Q. Are you still uncomfortable
2 with her today?

3 A. Slightly.

4 Q. Has that affected your job
5 performance at all?

6 A. No.

7 Q. Does Carmita ever act
8 strangely around you, like if she's got a
9 CD player and she sees you coming, she
10 makes sure that it's put away or
11 something?

12 A. I have not taken note of
13 the behavior, but possibly.

14 Q. But you've never noticed
15 any kind of behavior like that?

16 A. I'm very busy, I just don't
17 pay attention to that kind of stuff, I
18 can't.

19 Q. What information do you
20 possess that you believe supports the
21 idea that Mr. Matosavage was employed by
22 Sarner & Associates?

23 A. He said he was delivering
24 this for them.